

SRAXmd Privacy Policy

Last Updated: 6/1/2017

The purpose of this privacy statement is to inform you about the types of personal, behavioral, and other information we might collect about you when you visit websites that are owned and operated by Social Reality (the "Owned & Operated Properties") and how SRAXmd ("we," "our," or "us") may use that information. BY VISITING, SUBMITTING REGISTRATION OR LOGIN INFORMATION TO ANY OF OUR SITES, YOU AGREE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY THIS PRIVACY STATEMENT. IF YOU DO NOT AGREE TO BE SO BOUND, DO NOT VISIT OR LOG IN TO OUR WEBSITE OR LOG IN AS A "GUEST."

We reserve the right to modify this privacy statement, or any site-specific addendum hereto, at any time without notice. For example, we do not need to provide notification if we modify our practices regarding the collection or use of information. We will revise our "Last Updated" date to reflect any revisions to this Statement.

What Information Do We Collect?

- We may collect certain personally identifiable information ("PII") and other personal information you voluntarily submit as part of the registration/login process or opt-in to emails sent by Social Reality. The types of PII we may collect include your name, email address, device ID and telephone number. This information may be combined with information already in our possession or made available to us through United States federal and state medical professional databases, other files we are licensed to receive, and/or information we obtain from other sources. We may also collect information as a result of your interaction with any of our websites, a Social Reality or SRAXmd owned and operated email newsletter, or any communication received directly or indirectly from us. This means we may collect information from you through multiple locations, not just the website through which you initially register.
- We may capture certain information automatically on or through one or more of our websites, regardless of whether you provide us with personal information. This information may include your Internet protocol (IP) address, user agent strings, mobile device identification number, geolocation data, browser type, page access history, linking information, click stream data, page visits, page views, and/or website log files. If we identify that you are accessing Owned & Operated Properties websites through multiple devices, we will associate each such device with your profile.
- We will use cookies, log files, clear GIFs, pixels and/or similar devices to identify users and/or their computer(s) or mobile device(s) in order to keep track of users' interactions with our emails and websites and communications with us and to enhance certain activities available on Social Reality or SRAXmd websites or applications. These devices are small text or other electronic files that are used for user-identification and tracking purposes, record-keeping purposes, and to increase the ease of use of our sites or applications. We may use persistent or non-persistent cookies. You can remove or reject persistent cookies by following the directions provided in your Internet browser's "Help" file. If you remove a persistent cookie, you may be requested to reregister or log in again upon returning to our website or email newsletter opt-in. If you reject persistent cookies, the functionality of our websites or newsletters, or any part

thereof, may be impaired or unavailable. However, without accepting persistent cookies, you may use our websites as a guest.

How Do We Use Your Information?

We may use the information we collect from you in the following ways:

- To identify and verify your professional medical status through checking your information against the information listed on available databases, including those made available by the AMA, NPI number, and/or state licensing boards.
- To personalize and enhance your experience while interacting with SRAXmd client websites/mobile applications.
- To allow us to deliver the type of content and services that we believe may be of interest to you, including emails, newsletters, alerts, and advertising targeted to your professional experience and/or interests, based on your professional activities and/or other information we possess.
- To monitor usage and interaction statistics on SRAXmd websites and/or through responses to communications.
- To establish your online account and authenticate you during a registration or login to any of our portals, websites or e-newsletters.
- To quickly process your requests for information.
- To allow us to respond efficiently to your questions.
- To administer a contest, promotion, survey, or other feature.
- To send you advertising, information and/or promotional material geared to your profession. If you would no longer like to receive promotional email communications from us, please refer to the "How Can You Manage Your Email and Mobile Marketing Preferences" section below.
- To share your response information to email communications with the sponsor(s) of the professionally relevant program with which you interact.
- To allow us to disclose your information to the extent permitted by law, as described more fully below.

How Do We Protect Personal Information?

Although we cannot guarantee the security of personal information that is transmitted over the Internet or stored on our servers, we have established and implemented reasonable physical, electronic, and administrative procedures designed to safeguard and secure the personal information we collect and maintain online.

Please note that we do not have any control over or responsibility for information you share about yourself on or through websites outside of SRAXmd owned and operates sites and domains. All such sharing of information and content is done at your own risk. Any concerns over the sharing of information on or with a particular website not owned by SRAXmd or Social Reality should be handled by dealing directly with that website.

Do We Disclose the Information We Collect to Outside Parties?

Except as provided in this privacy statement, we will not sell, trade, or otherwise transfer your PII to third parties without advance notice. We may use your information, including disclosure to trusted third parties, in the following circumstances without advance notice:

- *Provision of Information.* Because some of our programs are targeted toward medical professionals only, advertisers or agencies have asked us to restrict access to certain information, products, and services to medical professionals only. To ensure that we are delivering the information, products, and services as may be required by law, we may share the overlap analysis of our database or aspects of your information with third-party sources to meet legal requirements (e.g., Certified Medical Education and PDMA) and determine your eligibility to receive the materials.
- *Subsidiaries and Affiliates.* We may transfer PII to our subsidiaries and corporate affiliates.
- *Website Consultants and Service Providers.* We may disclose personal information to third-party consultants and service providers (e.g., hosting/support/maintenance providers, third-party payment processing agencies, and remedial/repair services) to the extent that they require access to our databases – or the information contained in our databases – in order to perform services for us.
- *Third-Party Advertising.* We typically do not provide PII to any third party for marketing/advertising purposes but may disclose for internal analytics and user targeting confirmation only. We may disclose information about you to third parties, such as a SRAXmd ID tied to a unique record, an NPI or email address, so that these parties may verify that our programs were targeting specific users on target list or specialty programs.
- *Enforcement of Rights/Security.* We reserve the right to release personal information (i) when we are under legal compulsion to do so (e.g., we have received a subpoena) or we otherwise believe that the law requires us to do so, (ii) when we believe it is necessary to protect and/or enforce the rights, property interests, or safety of SRAX, our websites, our users, clients, or others, or (iii) as we deem necessary to resolve disputes, troubleshoot problems, prevent fraud, and otherwise enforce the privacy statement and other user agreements.
- *Reorganization or Sale of the Company.* In the event that we are merged with or become part of another organization, we are sold, we sell all – or substantially all – of our assets, or we are otherwise reorganized, the information you provide will be one of the transferred assets to the acquiring or reorganized entity.
- *As Otherwise Allowed by Law.* We may transfer personal information to third parties where we are expressly authorized by applicable law to do so.
- *Disclosure of non-PII.* In addition to you providing us with PII, you may also provide us with non-PII information (i.e., information which does not personally identify you). Such information may be disclosed to third parties, including for marketing and advertising purposes.
- *Aggregated Information.* We may aggregate information that you provide or is otherwise collected from or about you with information provided by other individuals in such a manner that the information is not personally identifiable to you. Such information may be transferred to third parties from time to time, including for marketing and advertising purposes.
- *Sponsors.* We may share your voluntary responses to communications with the sponsor(s) of the professionally relevant program with which you interact.

How Do I Ask Questions and Provide Feedback Regarding Privacy?

We welcome your questions, comments, and concerns about privacy. Please contact us at privacy@sraxmd.com with any questions or comments you may have regarding the privacy of your information.

How Can You Manage Your Personal Identifiable Information (PII)?

You can easily manage your marketing preferences by not providing information to us. However, to the extent that you choose to provide your PII to us, to a SRAX or SRAXmd client, you can opt out of having your PII used for certain purposes.

- You may opt out of receiving email communications by following the method stated in the privacy policy, or by utilizing the opt-out mechanism found in each email sent by us or a verified third party sending emails on our behalf to you. This will remove you from the email list or the website registration list and/or the sponsor of the communication.
- In addition, you may remove the email pixels that may track you and communicate information to us so long as they appear in the image cache of your Internet browser. You may remove the pixels simply by deleting the cache in which the pixel is stored.
- You may delete cookies by opening your browser's "Internet Options" folder and making the appropriate selections.
- If you are unsure of how to clean your cache or delete cookies, locate the "Help" function in the browser menu. Entering in the search bar "clean cache" and "delete browser cookies" will return instructions specific to your browser.